

# NFA Privacy Statement

This document explains what personal data the New Findhorn Association might hold about you and what responsibilities we have and what rights you have concerning that data.

Within this document The New Findhorn Association may be referred to as: The NFA, The Association, us, our or we. NFA members may be referred to as members or you. Users/ purchasers of NFA services who are not members may be referred to as subscribers, non-members, recipients or you. If you are legally responsible for a member of the NFA or a user of its services (e.g. you have power of attorney for them), then you may be able to carry out the rights and responsibilities ascribed in this document to members of the NFA and/ or users of its services.

## **What is personal data?**

When using the term 'personal data' in our Privacy Statement, we mean information that relates to you and allows us to identify you, either directly or in combination with other information that we may hold, particularly if it relates to data about sensitive information such as your health, finances and affiliations. For those of you who only want the NFA to announce your birthday in the Rainbow Bridge we may only hold your name and date of birth, but for those of you, who are members of the association and have filled in the NFA Critical Illness Form, the personal data we hold may include sensitive information about who can act on your behalf if you do not have capacity. (see **What types of data does the NFA store?** for more details.)

## **The purposes we use your personal data for**

The NFA promises to use your data only to carry out its stated functions. These are:

- 1) To administer the association and ensure the collection of fees;
- 2) To provide services to members and other users of services (see pages 5 to 7);
- 3) To carry out the purposes of the NFA mentioned in the association's constitution.

## **What justifications do we have for storing your data?**

We mainly only store your data if you have given us permission to do so.

However, there are exceptions to this rule. We also store your data when:

- 1) We are legally obliged to. For example: data regarding financial transactions must be kept for 7 years to comply with HMRC regulations on financial record keeping;
- 2) We are contractually obliged to;
- 3) The data concerned is both in the public domain and is used as part of one or more of our services (For example: the business listings within the NFA telephone directory.)
- 4) Or, in order to ensure the association fulfils those purposes defined in its constitution, we may have a reasonable justification for keeping personal data for reasons not covered above. For example, we will store:
  - a) sufficient information to identify you, if you are refused membership or you have been expelled from the association and the reasons for this decision;
  - b) personal data relating to you, if your presence is having a serious negative impact on the community, as part of our duty of care towards the Findhorn Community. This data will only be held for as long as is deemed necessary to manage or resolve the situation;
  - c) the names and contact detail of emergency contacts for NFA members. If an NFA member names you as their emergency contact, we will have asked if they have your permission for this, but we will not ask you directly.

## **Who is responsible, in the NFA, for looking after your personal data?**

The NFA Council is the body legally responsible for ensuring that the NFA complies with its legal obligations in respect of the UK General Data Protection Regulation 2018. Operational responsibility is delegated to the 'data controller' for the purposes of this Act, who, in the NFA is our Office Administrator.

## How will we treat your personal data?

We will:

- 1) keep the data we hold securely (see **How is my personal data kept secure?**);
- 2) limit access to the data we hold, to those personnel who need access to it, in order that the relevant association functions can be carried out (see **Who can access my personal data?**);
- 3) do our best to ensure that the data we hold is accurate;
- 4) only keep data that is required to carry out those purposes identified on the previous page;
- 5) if requested by you, we will supply copies of the data we hold on you, once all references to other identifiable individuals have been removed, within one month;
- 6) only share your data with other trusted organisations:
  - a) when you ask us to or give us permission to;
  - b) for the purposes identified on the previous page;
  - c) when the law requires us to;
- 7) Tell the Information Commissioner's Office (ICO) if we find out that your personal data has been accessed by an unauthorised person, stolen or lost.

## Who can access your personal data?

The NFA office administrator and Listener Conveners can access all personal data held within the NFA office and on NFA office computers and NFA online accounts.

The NFA office administrator, NFA office volunteers and Listener Conveners can access all personal data held within NFA members' Findhorn Foundation meal accounts.

The NFA accountant and NFA treasurer can access the Financial information the NFA hold.

All information collected by NFA office volunteers, who work in the NFA/ Findhorn Foundation's General Office, will be stored in a locked cabinet in the NFA office outside office hours.

At the discretion of the Listener Conveners, other individuals may be given time limited access to designated areas of the systems described in this section.

Some services, such as the NFA phone list and Website listings result in some personal data being put in to the public domain.

## What rights do you have?

You can:

- 1) withdraw consent for us to hold or use any part or all of your personal data, which we currently hold. If you do this, we will then remove from our records that portion of your personal data that we no longer have your consent to hold, for which we do not have another justification for continue to hold. (See **What justifications do we have for storing your data?**) Please note we are only able to provide you with services if we have the relevant information;
- 2) tell us about changes to your personal data or about data we have not stored accurately, and we'll re-enter your data correctly.
- 3) tell us to whom, if anyone, you want us to disclose your personal data too.
- 4) ask us for a copy of your data. Please see **How do we treat your personal data? 7)** for what happens after this.
- 5) withdraw consent for us to name you as a member's emergency contact. Your name and contact details will then be deleted from the relevant member's record and the member will then be asked to identify a new emergency contact.

## How is your personal data kept secure?

Personal data stored:

- 1) on paper, will be held by the NFA in a lockable cupboard in the NFA office, which is locked when no NFA staff or volunteers are present;
- 2) in the NFA database, which is on a server located in a country that has incorporated a General Data Protection Regulation into their domestic law;
- 3) on password protected computers that are kept in room(s), which are locked when not in use.

If you ask us to send out copies of your personal data to you or to a trusted organisation, we will either send it by:

- 1) registered mail; or
- 2) email. If this method is used, your personal data will be placed within an attachment with a password, which is agreed between sender and receiver before the email is sent;

Personal data received by:

- 1) email, by methods other than those described above will be transferred to the database, where applicable, and the email deleted.

## **How long will your personal data be kept?**

- 1) Any of data that you have given us permission to keep and for which there is no other justification for us to keep, will only be kept for as long as your permission lasts.
- 2) Data regarding your financial transactions will be kept for 7 years to comply with HMRC regulations on financial record keeping. After this time, they will be destroyed.
- 3) Data we keep in order to fulfil a contract, will only be kept while there are relevant contractual obligations outstanding.
- 4) Data we keep in order for the association to function and fulfil one or more of the purposes of the NFA (please see the NFA Constitution) when none of the other legal justifications apply, will be kept for only as long as the particular need exists. For example: we may keep personal data about individuals who pose a threat to our collective security and well-being.
- 5) If your membership lapses, then the data, which is stored by the NFA and is relevant to your membership will be kept for a further 2 years. During this time, you will be given those time limited services (see page 6) you have asked us to provide.
- 6) Every email message we send includes directions as to how to opt out of receiving services, should you wish to. You can also contact us to correct or update any of your personal data.
- 7) At the end of any payment period we will ask you whether you want to renew the relevant services. A similar enquiry will be made to non-members at the end of each time limited free service (see page 6). Your permission to provide you with free services that are not time limited will only be sought in order to commence such services.

If you want to become a member again or obtain any service from us once the records of your membership and/or subscriptions and/or free services are deleted you will have to re-supply us with the data necessary to give you the service(s) you want.

## **What types of data does the NFA store?**

What types of data does the NFA need before it will admit you as a member?

- Your name(s)
- How to contact you
- Confirmation of payment method, and your financial institution account details if this is required to carry out the payment
- Your permission to store your data

What other information do we ask you if we can store, in order to better provide you with services?

- Your date of birth
- Who we should contact in an emergency
- How many children you have.
- Your areas of skill and experience that you would like to offer or engage with.
- If and when, you've attended the Findhorn Foundation Experience Week Programme
- Which of our services do you want us to provide?
- The additional data necessary to provide those services.

### What data is stored to provide members and subscription services?

Service	Personal Data
NFA telephone directory	Name(s) and telephone number(s) entered into the phone list
Business listings on the NFA website (Only bed and breakfasts are currently listed on the NFA website)	Name(s) of proprietors contact details, business address and type of service, prices and description of the service. subscription payment details
NFA newsletter	Electronic delivery address
Rainbow bridge	Electronic delivery address and payment details
Findhorn Foundation Meal Account	Electronic delivery address and date Findhorn Foundation Experience Week Programme attended.
To inform you, which NFA affiliated organisations are looking for volunteers with your skills and interests	Skills and interests offered
To store what skills and interests each NFA affiliated organisation requires from volunteers.	Skills and interests required.

## What data will be stored for time limited services?

Service	Personal Data	Time Limit
NFA telephone directory for non-members	Name(s) and telephone number(s) of individuals entered into the phone list	2 years
Rainbow bridge birthday list for people up to their 12 <sup>th</sup> birthday.	Name, date of birth and name and contact details of parent/ guardian.	Up to 12 years
Minimal holding service. This service begins when your membership ends. It will enable you to ask us to restart your membership and other service(s) you have received in the past 2 years by submitting the minimum amount of information. This service also helps facilitate the NFA's awareness of community members who are not NFA members.	The NFA hold the ex-member's data they had stored prior to the start of this service, for the duration of this service.	2 years

## What data will be stored for services that are open ended?

Service	Personal Data
Rainbow bridge birthday list for people over 12 years of age	Name, email address, birth day and month
Add your name and/ or date of birth to the archive. This service will help histories of the association to be written and ensure that when ex-users of services re-connect with the association the history of their connection is known.	Name and date of birth (if provided)
To assist the NFA and Caring Community Circle in supporting you when you have care needs and to tell us what you would like to happen and who you want to be responsible after your death.	NFA Critical Illness Forms—. These are paper forms, which are locked in a cabinet in the NFA office. If you only receive this service, then only your name, date of birth and the date you completed your NFA Critical Illness Form is recorded electronically.
Business listings in the NFA telephone directory.	Name of business or owner, Contact details, and type of service.

## **What about my Payment details?**

### **What information does the NFA collect about me when I make a financial contribution?**

To process your membership fees and subscriptions we ask for your name, address, phone number and email address. We use this information to communicate with you about your payments and for financial auditing purposes.

### **How is online payment information processed?**

If your payment or donation is made through the NFA website we do not have access to your payment card details. These are processed by the independent financial service provider (which may be Paypal, Stripe or an other deemed suitable by the NFA Council).

### **How are offline payments processed?**

We take payments by standing order. The member or subscriber will fill out a standing order form and either send to their bank directly or we will send it for them. In the case of us sending it for them, we do not keep copies of the information provided to us.

We take payments by cash and cheque. In these cases, we will record the name of the payee, the amount and the purpose of the payment. These details are kept in a transaction folder on paper, which is kept in a locked cupboard.

### **How long is financial information stored?**

We retain these details for 7 years to comply with HMRC regulations on financial record keeping. After this time, they are destroyed

## **Do you ever share my information with third parties?**

We will only share your data with third parties if you ask us to or you give us permission.

The most common reason why you might ask us to share your data with a 3<sup>rd</sup> party is if you want us to set up a Findhorn Foundation meal account for you.

## **What categories of personal data do we hold without obtaining the identified individual's permission?**

- 1) Any persons that you identify in the data you give us, other than yourself (e.g. children, Next-of-kin or emergency contacts). It is your responsibility to be sure that you have these people's permission to record their name(s) and, where relevant, their contact details.
- 2) Sufficient information will be recorded to identify individuals refused membership or who have been expelled from the association and reason for this decision.
- 3) As part of our duty of care towards the Findhorn Community, personal data relating to individual(s) whose presence is having a serious negative impact on the community, may be held for as long as is deemed necessary to manage or resolve the situation.



## **What data does the NFA archive?**

Non-personal data relating to past usage of services is archived. This data is held in an anonymised state, to carry out audits or for research into ways of improving our services. If you give us permission to archive your name and date of birth alongside this non-personal data, it will no longer be anonymised, but this service will allow us to create more accurate histories of the NFA and help us re-connect with you if you haven't been using our services for a period. There is no time limit as to how long we will keep this data, but you can ask us to delete your name and date of birth from the archive at any time.

## **How to contact the NFA.**

The New Findhorn Association office is at: General Office, The Park, Findhorn IV36 3TZ and can be contacted via email using [nfa@findhorn.cc](mailto:nfa@findhorn.cc) or by phone 01309 692223.